

Compliance Quick-Reference Checklist

EUDR · FSMA 204 · Digital Product Passport (DPP/ESPR) · GS1 Sunrise 2027

A plain-language, practical reference for the regulations affecting agriculture, food, pharma, fashion, logistics, and retail supply chains - what each one requires, when it kicks in, and what to do before it does. Built by reGenesis.

EU Deforestation Regulation (EUDR)

Large/medium operators: Dec 30, 2026 | Micro/small: Jun 30, 2027

Requires proof that regulated commodities (cocoa, coffee, rubber, soy, palm oil, cattle, wood, and derived products) entering the EU market did not come from land deforested after December 31, 2020.

- ☐ Plot-level geolocation data for every farm or sourcing plot
- ☐ Documented evidence the land was not deforested after Dec 31, 2020
- ☐ A completed Due Diligence Statement (DDS) - or, for downstream non-SME operators, the supplier's DDS reference number
- ☐ A documented risk assessment for each sourcing region
- ☐ Five years of records retained and retrievable on request

FSMA 204 (US Food Traceability Rule)

Compliance required by: July 20, 2028

Applies to foods on the FDA's Food Traceability List (and anything made using one as an ingredient). Requires a Traceability Lot Code and Key Data Elements at 7 Critical Tracking Events, retrievable within 24 hours of an FDA request.

- ☐ Confirm which products are on the FDA Food Traceability List
- ☐ Identify which of the 7 Critical Tracking Events happen in your operation
- ☐ Standardize Traceability Lot Code assignment across every team
- ☐ Ensure records can be produced within 24 hours of a request
- ☐ Run a mock recall now to find the gaps before a real one does

EU Digital Product Passport (DPP / ESPR)

Batteries confirmed: Feb 18, 2027 | Other categories: date not yet finalized

Under the Ecodesign for Sustainable Products Regulation (Reg. (EU) 2024/1781), specific product categories must carry a QR-accessible digital record. Batteries are first and confirmed; textiles and other categories are expected to follow, but no confirmed date exists yet - treat any textile-specific date as a projection.

- ☐ Map material origin and composition data at the batch/lot level
- ☐ Record which facility or process stage produced each batch
- ☐ Document existing certifications tied to specific materials or suppliers
- ☐ Build a system linking this data to individual products, not just aggregate reports
- ☐ Start now - don't wait for a confirmed date to begin collecting historical data

GS1 Sunrise 2027 (2D Barcode Transition)

Industry capability target - not a legal mandate

GS1's coordinated push for retail point-of-sale systems to read 2D barcodes (GS1 DataMatrix, QR Codes) alongside today's 1D UPC/EAN codes. GS1 US is explicit this is a capability target, not a compliance deadline like EUDR or FSMA 204.

- ☐ Audit which products still rely on 1D-only barcodes
- ☐ Confirm packaging suppliers can print GS1 DataMatrix or QR codes
- ☐ Verify your point-of-sale and inventory systems can read 2D codes
- ☐ Use the added data capacity (lot, batch, expiration) to strengthen recall readiness

Not sure what applies to you?

reGenesis offers a free, no-commitment 1-hour consulting call to walk through which regulations affect your industry and what to prioritize first.

regenesisis.com/compliance-center

Sources: European Commission / EUR-Lex (Regulation (EU) 2023/1115 and its amendment Regulation (EU) 2025/2650), U.S. Food and Drug Administration (FSMA Section 204), GS1 US. Deadlines and requirements current as of September 2026 and subject to change - verify against official sources before making compliance decisions. This checklist is informational and is not legal advice.